Gwendolyn
Massenburg/R5/USEPA/US
10/02/2002 01:44 PM

To

Subject Chemical Recovery Systems (CRS), Inc., Notice of Deficiency to the Site Contractor Qualifications and Quality Management Plans (QMP)

Sent Via Electronic Mail and by Certified Mail Return Receipt Requested SR-6J

October 2, 2002

Mr. Douglas A. McWilliams, Esq.
Squire, Sanders, & Dempsey, L.L.P
4900 Key Tower
127 Public Square
Cleveland, OH 44114-1304

Re: Chemical Recovery Systems (CRS), Inc., Notice of Deficiency to the Site Contractor Qualifications and Quality Management Plans (QMP)

Dear Mr. McWilliams:

This is to inform your office of the deficiency of one of the two Quality Management Plans (QMPs) submitted on June 27, 2002. The QMP submitted by Parsons is deficient because it does not follow the requirements of the Administrative Order on Consent (AOC) Section VIII, Work To Be Performed, Paragraph 63, that: "The QMP should be prepared in accordance with "EPA Requirements for Quality Management Plans (QA/R-2)" (EPA/240/B-01/002, March 2001). Enclosed for your review are detailed comments from the U.S. EPA's reviewer regarding the specific deficiencies of the Parsons QMP. See enclosure PARSONS-QMP1.

The QMP submitted by Severed Trent Laboratories (STL) Corp. is in complete compliance with the U.S. EPA's requirement (see enclosure STL-QMP1). Approval of the STL QMP by the U.S. EPA reviewer is also enclosed with this letter.

Finally, also pursuant to the AOC, Section VIII, Work to Be Performed, Paragraph 63, "Respondent will amend and submit to the U.S. EPA a revised QMP within thirty days of receiving U.S. EPA comments." This notice of deficiency and the enclosed comments are being transmitted to you by electronic mail. Hard copies will follow by certified mail. Please submit your revision of the Parsons QMP within 30 days of receipt of the electronic transmission. Please feel free to contact Thomas C. Nash at 312-886-0552 if you have any questions or need additional information.

Sincerely,

Gwendolyn Massenburg, RPM
Remedial Project Manager
U. S. EPA
77 W. Jackson Blvd.
Chicago, IL 60604

312-886-0983 (v)
312-886-4071 (f)

enclosures
cc: Thomas Nash, ORC


STL-QMP1.wpd


PARSONS-QMP1.wpc

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SRT-4J

MEMORANDUM

DATE: September 12, 2002

SUBJECT: Review of the Quality Management Plan prepared Severn Trent Services (STL) Laboratory for Superfund Site at Chemical Recovery Systems, Inc., Ohio

FROM: Ida Levin, Quality Assurance Team Leader
Technical Services Section (TSS)

TO: Gwen Massenburg, Project Officer

I have reviewed the Quality Management Plan prepared by Severn Trent Services (STL) Laboratory for Superfund Site at Chemical Recovery Systems, Inc., Ohio. The document was received by TSS on July 2, 2002 (SF Log-in No.2905).
The STL laboratory Quality Management Plan describes the quality system which is in compliance with EPA requirements.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SRT-4J

MEMORANDUM

DATE: September 12, 2002

SUBJECT: Review of the Quality Management Plan prepared by Parsons for Superfund Site at Chemical Recovery Systems, Inc., Ohio

FROM: Ida Levin, Quality Assurance Team Leader
Technical Services Section (TSS)

TO: Gwen Massenburg, Project Officer

I have reviewed the Quality Management Plan prepared by Parsons for Superfund Site at Chemical Recovery Systems, Inc., Ohio. The document was received by TSS on July 2, 2002 (SF Log-in No.2904). The submitted document which was labeled QMP just includes the bullets and definitions from the EPA QA/R-2 document, with references to two submitted documents: Parsons QA policy and Ohio Operation Quality Assurance Program. The review of these documents were very time consuming for the reviewer, because neither of the referenced documents followed the EPA requirements. The Parson should prepare one document, following EPA requirements which will be applicable to all states where work for the superfund program will be done. The submitted documents lack the details. The following itemize the QMP deficiencies:

1. Management and Organization, Section 1.

a. The QMP plan shall be submitted for the review with complete signed and dated signature page by senior management and QA manager of Parsons. This page is not included in the Parson QA Policy Manual.

b. The Parsons QA manual and Ohio Operation Quality Assurance Program have the same Quality Assurance Policy Statements. Ohio document could just reference the Parson manual.

c. The Parsons organizational chart that identifies all of the components of the organization and in particular, the organizational position and lines of reporting for the QA Manager (or similar position such as Quality Manager) and any QA staff is not included in the document. The referenced Figure 3-1 is missing.
The Ohio Quality Assurance Program should include the organizational chart with lines of reporting of the Quality Assurance Manager. Section 2.1.2 referenced Technical Director for the technical review of the Project Management Plan. Do you prepare PMP

and QAP for each project and who is responsible for the review and approval of these documents.

a. In the Ohio Quality Assurance program the abbreviation QAP stands for QA Plan and Quality Assurance Program (section 2.1 and thru the document). This is very confusing and must be corrected.

b. It should be clearly identified in Section 3.3 of Parsons QA Manual and on the organizational chart how many QA Managers are reporting to the president of Parsons Group.

c. In Section 2.1.2 of Ohio Quality Assurance program the description of Project Manager responsibility needs to be revised. The QAP stands for the QA project or QA program? The explanation should be provided in third sentence how QAP will have an access to PMP?

d. A discussion of how management will assure that applicable elements of and criteria for the quality system are understood by managers and staff, and implemented in all environmental programs should be provided.

2. Quality System Components, Section 2.

a. The principal quality system components (annual reviews and planning, systematic planning of projects, managements assessments, project and data assessments) are not described in the submitted documents. The description should provide how these components will be implemented by Parsons.

b. The referenced Section 6 for the implementation tools does not provide information about the Quality Management Plans; Quality System Audits; Quality Assurance Project Plans; Standard Operating Procedures; Data quality assessment process. This should be described in details in this section.
The Ohio Quality Assurance program QA plan included in the Appendix A, did not followed EPA requirements. If the document is prepared for Region 5, it must followed Region 5 Superfund Instructions for QAPP preparation.

c. In Section 2 should be clearly identified who is responsible for QMP preparation, review and approval. The submitted documents do not provide this information.

3. Personnel Qualification and Training, Section 3.

a. The QMP did not describe the ways in which the management will encourage professional development beyond initial qualification; nor how they will identify qualified trainers; assess the effectiveness of training and where applicable establish a program for training and updating the instructors on training techniques and technical changes and reviewing and updating the training materials and course contents.

4. Procurement of Items and Services, Section 4.

a. The process including the roles, responsibilities and authorities of management and staff in procuring items and services of acceptable quality should be described in details in the

section.

b. This QMP does not described process for reviewing and approving applicable responses to solicitation to ensure that they satisfy all technical and quality requirements.

c. This QMP does not describe the process for the review and approval of suppliers' quality-related documentation (e.g.,QAPPs and QMPs)

5. Documentation and Records, Section 5.

a. This section of QMP does not describe in details process for preparing, reviewing, approving, issuing, and revising documents.

b. This section of QMP does not described in details process for maintaining documents and records including transmittal, distribution, retention, access, traceability, removal of obsolete documentation, and disposition.

c. This section of the QMP does not described process for establishing and implementing appropriate chain of custody and confidentiality procedures for evidentiary records.

6. Computer Hardware and Software, Section 6.

a. The referenced section 5.5 does not describe the process for developing, installing, testing, using, maintaining, controlling, and documenting computer hardware and software.

b. The process for ensuring that computer hardware used in environmental programs meets technical requirements and quality expectation should be described.

c. The QMP does not describe the roles and responsibilities pertaining to hardware and software QA that are assigned to management and staff.

4. Planning, Section 7.

a. This section should identify who is responsible and how general project planning is documented.

b. The description of the systematic planning process for environmental data collection should be provided.

c. The process for developing, reviewing, approving, implementing, and revising QAPPs should be described in this section.

d. Section 7.2.2 should reference the EPA Requirements for QAPP (QA/R-5) and Region 5 Instructions on Preparation of a Superfund Division QAPP, June 2000.

e. This section should identify the acceptance criteria for results or measurements of performance by which customer satisfaction will be determined.

8. Implementation of Work Processes, Section 8.

a. The process for ensuring that work is performed according to planning and technical documents should provide more details.

b. This section should describe process for preparation, review, approval, revision, and

withdrawal of these procedures.

c. This section should provide more details in the removal of obsolete documentation from work area, and verification that the changes are made as prescribed.

9. Assessment and Response, Section 9

a. This section should clearly specify which assessment tools (such as quality system audits, performance evaluation, peer reviews, readiness reviews, surveillance, etc.) will be used to examine the effectiveness of the technical and QA/QC activities in a project.

b. The process for planning, implementing and documenting assessment and reporting the results to management should be described in details.

c. The QMP must describe how the level of competence, experience, and training necessary to ensure the capability of personnel conducting the assessments are determined.

d. The process for identifying how and when corrective actions are to be taken in response to findings of the assessment should be described.

e. Describe the process for management's review of, in addition to QAM, and response to finding.

10. Quality Improvement, Section 10.

a. This should describe process for ensuring that conditions adverse to quality are prevented, identified promptly, corrected promptly and that actions are taken toward prevention, documented and action tracked to closure.

b. It should identified if the reanalysis of the samples are not possible due to holding time, the resampling will be performed.